

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

AFT MICHIGAN,

Plaintiff,

v.

Case No.

Hon.

**PROJECT VERITAS, A VIRGINIA
CORPORATION, AND MARISA L.
JORGE, A/K/A MARISSA JORGE,
A/K/A MARISSA PEREZ,**

Defendants.

DEFENDANTS' NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant Project Veritas, a Virginia corporation (hereafter “Project Veritas”) and Marisa L. Jorge, a/k/a Marissa Jorge, a/k/a Marissa Perez (hereafter “Jorge,” and collectively the “Defendants”), by and through their counsel, Butzel Long, P.C., hereby remove this action from the Third Circuit Court for the County of Wayne, Michigan, in which it is pending with Case No. 17-014348-CZ, to the United States District Court for the Eastern District of Michigan. In support of this Notice of Removal, Defendants state as follows:

1. State Court Action. On or about September 28, 2017, Plaintiff AFT Michigan (“Plaintiff”) commenced suit in the Third Circuit Court for the County of Wayne, Michigan in a matter pending as Case No. 17-014348-CZ (the “Lawsuit”).

Defendants became aware of the Complaint on or about September 29, 2017. Upon information and belief, an Amended Complaint was filed on or about October 5, 2017, but has not been served on any Defendants.

2. Allegations in the Complaint. The lawsuit is a civil action by which Plaintiff seeks to recover alleged damages based on allegations of fraudulent misrepresentation, trespass, eavesdropping, larceny by trick, civil conspiracy and breach of the Uniform Trade Secrets Act.

3. Diversity Jurisdiction. This honorable Court has original jurisdiction over this action under the provisions of 28 U.S.C. § 1332 because it is wholly between citizens of different states as follows:

- a. Project Veritas is incorporated under the laws of the State of Virginia, and its principal place of business is located in Mamaroneck, New York.
- b. Jorge is a citizen of the state of New York.
- c. Upon information and belief, and based upon the representations in Plaintiff's Complaint in this action, Plaintiff is a Michigan labor organization, and its members are citizens of the state of Michigan.

Also, based on the pleadings in the Complaint, the amount in controversy exceeds \$75,000, excluding interest and costs (though Defendants deny liability for any such alleged damages).

4. State Court Documents Attached. Copies of all process and pleadings filed in the Lawsuit known to Defendants at the time of this filing are attached hereto as **Exhibit 1**.

5. Notice of Removal. This Notice of Removal is filed within thirty (30) days of the date that Defendants received a copy of the Complaint in the Lawsuit and first became aware of it.

6. Notice to Plaintiff in State Court. Promptly upon filing this Notice of Removal with this Court, Project Veritas, through its undersigned counsel, will give written notice hereof to Plaintiff, through counsel, and will file with and serve on the clerk of the Third Circuit Court of the County of Wayne a copy of this Notice.

7. Removal. Defendants respectfully give notice that this action is hereby removed from the Third Circuit Court for the County of Wayne to the United States District Court for the Eastern District of Michigan.

WHEREFORE, Defendant Project Veritas and Defendant Jorge hereby remove this action from the Circuit Court for the County of Wayne, State of Michigan to the United States District Court for the Eastern District of Michigan.

Respectfully submitted,

BUTZEL LONG, a professional corporation

By: /s/ Paul M. Mersino

Paul M. Mersino (P72179)
150 W. Jefferson Ave., Suite 100
Detroit, MI 48226
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Dated: October 6, 2017

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A/K/A MARISSA PEREZ,**

Defendants.

**DEFENDANTS' CERTIFICATE OF SERVICE
OF NOTICE OF REMOVAL**

I hereby certify that, on October 6, 2017, I caused a copy of Defendant Project Veritas's and Defendant Marisa L. Jorge's Notice of Removal (and all corresponding pleadings), Civil Cover Sheet, and 7.1 Disclosure Statement to be served *via* ECF and regular mail upon counsel of record for Plaintiff AFT Michigan, addressed as follows:

Mark H. Cousens
26261 Evergreen Road, Ste. 110
Southfield, MI 48076

**BUTZEL LONG, a professional
corporation**

By: /s/ Paul M. Mersino

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